

**CALIFORNIA EMERGENCY MANAGEMENT AGENCY****PUBLIC SAFETY AND VICTIM SERVICES DIVISION**

3650 SCHRIEVER AVENUE
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April 29, 2010

Dina Polkinghorne
Executive Director
Project Sanctuary
564 South Dora St. Suite A-1
Ukiah, Ca 95482

Re: DV09121657

Dear Ms. Polkinghorne:

On April 22nd, I conducted a site visit of the Domestic Violence Assistance Program operated by Project Sanctuary. Thank you for your time and cooperation during the Site Visit. It was a pleasure meeting with you, Judy, Pat, Carissa, and the other staff working on the program.

During the site visit, we discussed Cal EMA's requirements for the project, the goals and objectives of the program, the project's source documentation, and the reporting requirements. As a result of the visit, I have identified areas which need corrective action. Each finding is listed below, as well as the corrective action necessary for compliance and due date by which the corrective action must be completed.

Organizational Policies and Procedures

Finding: The project lacks written organizational policy and procedures that establish the process whereby data is collected and then reported. The project has procedures for accomplishing the recording tasks, but lacks a formalized policy for the handling of data.

Citation: Recipient Handbook Section 11400 states, "The organization must have written policies and procedures covering hiring, firing, termination, conflict of interest, benefits, salary rates, travel, etc. There should also be written procedures regarding the accounting and reporting functions, including but not limited to a) Cash receipts and revenue; b) deposits; c) cash disbursements; d) payroll; e) general ledger; and f) equipment. In addition, any other policies and procedures (e.g., purchasing contracts) that relate to operating the project must be in writing."

Corrective Action: A comprehensive administrative policy and procedure manual should be created to formally document the methods used for the collection of data related to the project, the responsibility of personnel involved in the reporting of data, as well as any other procedural guidelines for the functioning of the business. This process should be completed no later than **October 29, 2010.**

EEO Policy

Finding #1: The project lacks written policies for language assistance services that provide Limited English Proficiency (LEP) persons with meaningful access, i.e. oral interpretation services, bilingual staff, telephone interpreter lines, written language services, community volunteers, etc.

Citation: Recipient Handbook Section 2151.7 states, “Cal EMA program staff will provide an EEO Checklist to recipients prior to all site/monitoring visits. The checklist will assist Cal EMA in verifying that recipients are in compliance with state and federal civil rights requirements by noting that various EEO documents (EEO Policy, Nondiscrimination Poster) are available at the site/monitoring.”

Corrective Action: Personnel responsible for EEO compliance should contact the Cal EMA EEO Compliance Officer at (916) 845-8454 for additional information on specific state and federal civil rights laws to ensure compliance. Additionally, the project should establish a written personnel policy and a written administrative policy for addressing the needs of those with LEP. Evidence of this new policy should be submitted to Cal EMA no later than **October 29, 2010**.

Finding #2: The project does not distribute the written EEO policy to clients or the general public.

Citation: See Recipient Handbook Section 2151.7.

Corrective Action: Personnel responsible for EEO compliance should contact the Cal EMA EEO Compliance Officer at (916) 845-8454 for additional information on specific state and federal civil rights laws to ensure compliance. Additionally, the project should post a copy of all EEO Policies in a public forum in addition to distributing the EEO policy to volunteers during orientation. Evidence steps have been taken to inform clients and the general public should be provided to Cal EMA no later than **October 29, 2010**.

Functional Timesheets

Finding: The project is not currently using functional timesheets to track grant funded positions.

Citation: The Recipient Handbook (Section 11331) states “All grant-funded personnel must maintain time cards/sheets that indicate on a daily basis, the actual time worked on each Cal EMA project and account for all the time worked by the employee during the pay period... An allocation plan may be used to allocate salaries and benefits for individuals who work on more than one program or grant (see Section 2173).”

Corrective Action: Currently, the project tracks employees’ hours by grant. However, these time sheets do not provide a description of what the employee is doing during the hours billed to the grant. The current method does not indicate function; it merely indicates billing allocation. A copy of the new functional timesheet should be submitted to Cal EMA no later than **October 29, 2010**.

Additionally, the Employee Handbook should be revised to provide policy as to the use of functional timesheets.

Proof of Authority

Finding: The project does not have a written authorization/resolution on file as required by the Grant Award Agreement.

Citation: The Recipient Handbook Section 1350 states, “All recipients, except for State Agencies, are required to obtain written authorization from the city council/ governing board that the official executing the agreement is, in fact, authorized to do so (e.g. a Resolution, pertinent Minutes, or a letter from the Board Chair). Recipients must maintain this written authorization on file and make it available on demand.”

Corrective Action: The Executive Director will need to go before the board and obtain written authorization giving the Executive Director permission to conduct business including the authority to apply for and execute policy related to the Grant Award Agreement with Cal EMA. This resolution should be sought annually, prior to the beginning of the new grant year (fiscal year). A copy of this resolution should be submitted to Cal EMA no later than **July 1, 2010**.

Additional Administrative Recommendations

- 1) Both volunteer and staff (those responsible for direct services to clients) should have copies of the syllabus from their 40 hour training in their files. This is not mandated in the 09/10 RFA, but it is required in the 10/11 RFA.
- 2) The agency currently lacks a Cost Allocation Plan that justifies the shared expenses allocated to the grant. Once functional timesheets are in place a Time Study can be conducted to accurately determine the percentages of funding each position receives. After the total number of FTEs has been determined, a reasonable cost allocation can be justified for the grant. By identifying all fund sources and projected expenses, the agency may better substantiate the costs being billed.

Enclosed is a copy of the completed Site Visit Checklist form for your review. Please sign the cover page and return a copy of the page to me by **May 30, 2010** as confirmation of receipt.

Thank you again for your hospitality during the visit. If you have any questions or need assistance, please contact me at (916) 324-9104 or Jason.Stalder@calema.ca.gov.

Sincerely,

Jason Stalder
Criminal Justice Specialist
Domestic Violence Section

Enclosures